

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

MELISSA WILLES,
an individual on behalf of
herself and all others
similarly situated,

Plaintiff,

V.

ALTA COLLEGES, INC.,
a Delaware Corporation,
WESTWOOD COLLEGE, INC.,
a Colorado Corporation, et al.,

Defendants.

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Case No. 3:10-cv-00441-slc

## DECLARATION OF BILL OJILE

1. My name is Bill Ojile. I am over the age of eighteen (18) years, mentally competent, and have personal knowledge of the facts set forth herein.

2. I am the Senior Vice President, and Chief Legal and Compliance Officer of Westwood College and have knowledge of the School's records on enrollees in Westwood College Online.


3. I understand that Plaintiff has recently, in response to the Court's latest Order, raised some doubt as to the amount each class member may be seeking in this action, suggesting that class members might have widely divergent claims to recovery based on the amount of tuition and fees they paid. This has been in spite of Plaintiff's prior allegation that her claim is supposedly representative of the putative class. I offer this additional declaration to clarify this new question of tuition and class size.

4. For the January 2005 term, the total amount of tuition and fees for the various programs offered through Westwood College Online ranged from \$25,725 to \$75,672. This takes into account tuition ranging from \$2,796 to \$4,475 per term, fees ranging from \$220 to over \$2,400, and the number of terms required to complete the School's online programs ranging from 5 terms to 22 (Westwood has five terms each calendar year). Tuition rates generally rose annually each year between January 2005 and July 2010.

5. Further, while I have twice accurately stated that more than 200 individuals fall within the putative class definition of "[a]ll persons who were residing in Wisconsin at the time that such persons entered into enrollment agreements with [the School] for the purpose of enrolling in or attending Westwood College Online," a recent review of the School's records shows that the actual number is many times more than 200. From January 1, 2005 through July 12, 2010, about 1,541 students enrolled using Wisconsin addresses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 25th day of April, 2011.

  
**BILL OJILE**